

# EXHIBIT A

INDIRECT PURCHASER PLAINTIFFS' PROPOSED SPECIAL VERDICT FORM –  
Master File No. 3:07-cv-5944 SC

The Indirect Purchaser Class Plaintiffs (“Plaintiffs”) submit their proposed special verdict form pertaining to their state antitrust and consumer protection claims. Plaintiffs reserve the right to amend, supplement, or otherwise revise this verdict form as appropriate following the Court’s rulings on any pending or pretrial motions, a final determination as to the manner in which these cases will be tried, or as is otherwise reasonable and appropriate.

We the Jury find as follows:

**Question No. 1**

Did any of the Defendants and Co-Conspirators listed below participate in a conspiracy to fix, raise, maintain, or stabilize prices for CRTs in violation of the antitrust laws of one or more of the following states: Arizona, California, Iowa, Kansas, Maine, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New Mexico, New York, North Carolina, North Dakota, South Dakota, Tennessee, Vermont, West Virginia, Wisconsin, or the District of Columbia?

<b>Chunghwa</b>	<b>YES</b> _____	<b>NO</b> _____
<b>Daewoo/Orion</b>	<b>YES</b> _____	<b>NO</b> _____
<b>Hitachi</b>	<b>YES</b> _____	<b>NO</b> _____
<b>IRICO</b>	<b>YES</b> _____	<b>NO</b> _____
<b>LG Electronics</b>	<b>YES</b> _____	<b>NO</b> _____
<b>LG.Philips Displays</b>	<b>YES</b> _____	<b>NO</b> _____
<b>LP Displays</b>	<b>YES</b> _____	<b>NO</b> _____
<b>Mitsubishi</b>	<b>YES</b> _____	<b>NO</b> _____
<b>Panasonic</b>	<b>YES</b> _____	<b>NO</b> _____
<b>MT Picture Display</b>	<b>YES</b> _____	<b>NO</b> _____
<b>BMCC</b>	<b>YES</b> _____	<b>NO</b> _____
<b>Philips</b>	<b>YES</b> _____	<b>NO</b> _____
<b>Samsung</b>	<b>YES</b> _____	<b>NO</b> _____
<b>Samtel</b>	<b>YES</b> _____	<b>NO</b> _____
<b>Thai CRT</b>	<b>YES</b> _____	<b>NO</b> _____

**Thomson** YES \_\_\_\_\_ NO \_\_\_\_\_

**Toshiba** YES \_\_\_\_\_ NO \_\_\_\_\_

**Videocon** YES \_\_\_\_\_ NO \_\_\_\_\_

*(If you answered "Yes" to Question No. 1 for one or more of the Defendants and Co-Conspirators, please continue to Question No. 2. If you answered "No" to this question, please proceed to Question No. 7.)*

**Question No. 2**

Did the Defendants and Co-Conspirators injure the class members by the conspiracy?

YES \_\_\_\_\_ NO \_\_\_\_\_

*(If you answered "Yes" to Question No. 2, please continue to Question No. 3. If you answered "No" to this question, your work is done, do not answer any other questions and please sign the verdict form.)*

**Question No. 3**

Did the Defendants and Co-Conspirators fraudulently conceal the conspiracy?

YES \_\_\_\_\_ NO \_\_\_\_\_

*(If you answered "Yes" to this question, please proceed to Question No. 4; if you answered "No" to this question, please proceed to Questions No. 5 and 6.)*

**Question No. 4**

If you find that any of the Defendants and Co-Conspirators conspired to fix, raise, maintain, or stabilize prices for CRTs in violation of the antitrust laws of any one of the states listed below, then for each such state, write in the amount of damages you find that the class members sustained in that state as a result of the antitrust violation(s):

**Arizona** \$ \_\_\_\_\_

**California** \$ \_\_\_\_\_

**District of Columbia** \$ \_\_\_\_\_

**Hawaii** \$ \_\_\_\_\_

**Iowa** \$ \_\_\_\_\_

**Kansas** \$ \_\_\_\_\_

1	<b>Maine</b>	\$ _____
2	<b>Michigan</b>	\$ _____
3	<b>Minnesota</b>	\$ _____
4	<b>Mississippi</b>	\$ _____
5	<b>Nebraska</b>	\$ _____
6	<b>Nevada</b>	\$ _____
7	<b>New Mexico</b>	\$ _____
8	<b>New York</b>	\$ _____
9	<b>North Carolina</b>	\$ _____
10	<b>North Dakota</b>	\$ _____
11	<b>South Dakota</b>	\$ _____
12	<b>Tennessee</b>	\$ _____
13	<b>Vermont</b>	\$ _____
14	<b>West Virginia</b>	\$ _____
15	<b>Wisconsin</b>	\$ _____

16 *(Please proceed to Question No. 7.)*

17 **Question No. 5**

18 If you find that any of the Defendants and Co-Conspirators conspired to fix, raise,  
 19 maintain, or stabilize prices for CRTs in violation of the antitrust laws of any one of the states  
 20 listed below, then for each such state, write in the amount of damages you find that the class  
 21 members sustained in that state as a result of the antitrust violation(s), excluding any amounts for  
 22 purchases before November 2003:

23	<b>Arizona</b>	\$ _____
24	<b>California</b>	\$ _____
25	<b>District of Columbia</b>	\$ _____
26	<b>Hawaii</b>	\$ _____
27	<b>Iowa</b>	\$ _____
28	<b>Kansas</b>	\$ _____

**Michigan** \$ \_\_\_\_\_

**Minnesota** \$ \_\_\_\_\_

**Mississippi** \$ \_\_\_\_\_

**Nebraska** \$ \_\_\_\_\_

**Nevada** \$ \_\_\_\_\_

**New Mexico** \$ \_\_\_\_\_

**New York** \$ \_\_\_\_\_

**North Carolina** \$ \_\_\_\_\_

**North Dakota** \$ \_\_\_\_\_

**South Dakota** \$ \_\_\_\_\_

**Tennessee** \$ \_\_\_\_\_

**West Virginia** \$ \_\_\_\_\_

*(Please proceed to Question No. 6.)*

**Question No. 6**

For the states Maine, Vermont and Wisconsin, please write in the amount of damages that the class members sustained in that state as a result of the antitrust violation(s), excluding any amounts for purchases before November 2001:

**Maine** \$ \_\_\_\_\_

**Vermont** \$ \_\_\_\_\_

**Wisconsin** \$ \_\_\_\_\_

*(Please Proceed to Question No. 7.)*

**Question No. 7**

Did any of the Defendants and Co-Conspirators listed below violate the unfair trade practices laws of Florida?

**Chunghwa** YES \_\_\_\_\_ NO \_\_\_\_\_

**Daewoo/Orion** YES \_\_\_\_\_ NO \_\_\_\_\_

**Hitachi** YES \_\_\_\_\_ NO \_\_\_\_\_

**IRICO** YES \_\_\_\_\_ NO \_\_\_\_\_

1	<b>LG Electronics</b>	<b>YES</b> _____	<b>NO</b> _____
2	<b>LG.Philips Displays</b>	<b>YES</b> _____	<b>NO</b> _____
3	<b>LP Displays</b>	<b>YES</b> _____	<b>NO</b> _____
4	<b>Mitsubishi</b>	<b>YES</b> _____	<b>NO</b> _____
5	<b>Panasonic</b>	<b>YES</b> _____	<b>NO</b> _____
6	<b>MT Picture Display</b>	<b>YES</b> _____	<b>NO</b> _____
7	<b>BMCC</b>	<b>YES</b> _____	<b>NO</b> _____
8	<b>Philips</b>	<b>YES</b> _____	<b>NO</b> _____
9	<b>Samsung</b>	<b>YES</b> _____	<b>NO</b> _____
10	<b>Samtel</b>	<b>YES</b> _____	<b>NO</b> _____
11	<b>Tatung</b>	<b>YES</b> _____	<b>NO</b> _____
12	<b>Thai CRT</b>	<b>YES</b> _____	<b>NO</b> _____
13	<b>Thomson</b>	<b>YES</b> _____	<b>NO</b> _____
14	<b>Toshiba</b>	<b>YES</b> _____	<b>NO</b> _____
15	<b>Videocon</b>	<b>YES</b> _____	<b>NO</b> _____

16 *(If you answered “Yes” to Question No. 7 for one or more of the Defendants and Co-Conspirators*  
 17 *and answered “No” to Question No. 1, please continue to Question No. 8. If you answered “Yes”*  
 18 *to Question No. 7 for one or more of the Defendants and Co-Conspirators and answered “Yes” to*  
 19 *Question No. 3, please continue to Question No. 10. If you answered “Yes” to Question No. 7 for*  
 20 *one or more of the Defendants and answered “No” to Question No. 3, please continue to Question*  
 21 *No. 11. If you answered “No” to Question No. 7, your work is concluded, do not answer any more*  
 22 *questions and please sign the verdict form.)*

23 **Question No. 8**

24 Did the Defendants and Co-Conspirators injure the class members by the conspiracy?

25 **YES** \_\_\_\_\_ **NO** \_\_\_\_\_

26 *(If you answered “Yes” to Question No. 8, please continue to Question No. 9. If you answered*  
 27 *“No” to this question, your work is done, do not answer any other questions and please sign the*  
 28 *verdict form.)*

**Question No. 9**

Did the Defendants and Co-Conspirators fraudulently conceal the conspiracy?

YES \_\_\_\_\_ NO \_\_\_\_\_

*(If you answered "Yes" to this question, please proceed to Question No. 10; if you answered "No" to this question, please proceed to Question No. 11.)*

**Question No. 10**

If you find that any of the Defendants and Co-Conspirators violated the consumer protection laws of Florida, then write in the amount of damages you find that the class members sustained in that state as a result of the consumer protection violation(s):

**Florida** \$ \_\_\_\_\_

*(Please proceed to Question No. 12.)*

**Question No. 11**

If you find that any of the Defendants and Co-Conspirators violated the consumer protection laws of Florida, then write in the amount of damages you find that the class members sustained in that state as a result of the consumer protection violation(s), excluding any amounts for purchases before November 2003:

**Florida** \$ \_\_\_\_\_

*(Please proceed to Question No. 12.)*

**Question No. 12**

If you wrote an amount greater than zero in Questions No. 4 or No. 5 for the following states, do you find that the Defendants acted flagrantly in injuring the class members?

**Arizona** YES \_\_\_\_\_ NO \_\_\_\_\_

**Michigan** YES \_\_\_\_\_ NO \_\_\_\_\_

*(Your work is concluded and please sign the verdict form.)*

Dated: \_\_\_\_\_, 2015 Jury Foreperson: \_\_\_\_\_